



February 17, 2019

**VIA ECF**

Honorable William F. Kuntz, II  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Emergency Motion to Seal Exhibits *Nunc Pro Tunc*  
*Almerdaei, et al. v. Trump, et al.*, No. 19-CV-830 (Kuntz, J.)

Dear Judge Kuntz:

Plaintiffs respectfully request this Court seal *nunc pro tunc* exhibits in support of Plaintiffs' Motion for Preliminary Injunction, ECF Nos. 27-30, filed by the Clerk on February 12, 2019.

On February 12, 2019, pursuant to Local Civil Rule 5.2, Plaintiffs filed a hard copy in person at the Clerk's office Plaintiffs' Emergency Motion for Temporary Restraining Order (the "Motion") and supporting exhibits "A" to "RRR." Due to miscommunication, which has now been cleared with management in the Clerk's office, there were issues with the Clerk's office accepting Plaintiffs' Motion and supporting exhibits. Plaintiffs' counsel were then called to appear for the Motion before Judge Hall, and by the time the hearing concluded, the Clerk's office closed. As such, Plaintiffs sealing cover sheet was not received by the Clerk and the exhibits were filed on the docket of this case unsealed.

Plaintiffs respectfully request that supporting exhibits to Plaintiffs' Motion be sealed *nunc pro tunc* to the date they were filed, February 12, 2019. Pursuant to Federal Rule of Civil Procedure 5.2(d), the court may order that a filing be made under seal without redaction. Here, the exhibits to Plaintiffs' Motion contain personal information and concerns minors such as medical records and full names and residential addresses of minors. It is imperative and urgent that the exhibits be sealed for the privacy and protection of those parties.

Plaintiffs thank the Court for its time and consideration in this matter.

Respectfully submitted,

/s/ Julie Goldberg  
Julie A. Goldberg, Esq.

cc via ECF: AUSA Franklin Amanat and OIL Trial Attorney Archith Ramkumar